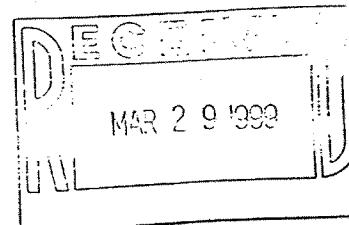




## TASK FORCE DETAINEES OF THE PHILIPPINES

Established in 1974 by the Association of Major Religious Superiors of the Philippines

March 13, 1999



Atty. Robert Swift  
Kohn, Swift & Graf, P.C.  
1101 Market Street, Suite 2400  
Philadelphia, PA 19107  
Fax: 001-215-238-1968

Dear Atty. Swift,

In a discussion between you, Sr. Mariani Dimaranan and Sr. Crescencia Lucero during your visit to the Philippines in 1993, it was agreed that TFDP assist the victims of Marcos atrocities in filing their cases with the Hawaii court. TFDP assisted about 6,000 victims in the making of affidavits, in the documentation of their cases and accessing of supporting documents regarding the human rights violations.

As per our records, there is an account receivable from Atty. Robert Swift in the amount of Two hundred seventy eight thousand three hundred twenty seven & fifty centavos only (Php 278, 327.50). These were expenses incurred by TFDP in assisting the victims of human rights violations in filing their cases in the Hawaii court as part of the human rights litigation against Ferdinand E. Marcos. If need be, a certification by an external auditor maybe sent to you regarding this account.

Should you need further clarification regarding this matter, please inform us.

Very respectfully,

*Aurora A. Parong*  
Aurora A. Parong, M.D.  
Executive Director

CC: Atty. Rod Domingo

EXHIBIT

C



## SAMAHAN NG MGA EX-DETAINEE LABAN SA DETENSYON AT PARA SA AMNESTIYA

(SOCIETY OF EX-DETAINEES FOR LIBERATION AGAINST DETENTION AND FOR AMNESTY.)  
NO. 18 MARUNONG ST., CENTRAL DISTRICT DILIMAN, QUEZON CITY  
TELEFAX: 922-40-91

July 5, 1995

ATTYS. ROBERT SWIFT  
AND RODRIGO DOMINGO  
Counsels for the Class Suit  
5th Floor Dominion Bldg.  
833 Arnaiz Avenue  
Makati City

Dear Attys. Swift and Domingo,

Our warmest greetings!

First we would like to apologize since it is only now that we were able to submit the expenses which we have incurred during the depositions of the victims conducted October and November of last year. Due to the never ending campaigns for the release of the political prisoners, the Flor Contemplacion case, it is only now that we were able to give attention to the financial report with regard to the depositions of the victims.

We hope that this is not so late and can still be given attention.

Thank you very much.

Sincerely yours,

*Isabelita A. Sombillo*  
ISABELITA "IRA" SOMBILLO  
Projects/Welfare Coordinator

P.S. Can you give us the latest update with regard to the case?  
Again, thank you.

Expenses incurred during the 1994 depositions:

Date:	Particulars	Amount
Oct. 19, 1994	- transportation expenses for Renato Pineda in locating victims in Central Luzon	P 800.00
Oct. 20, 1994	- Transportation expenses to Lopez, Tagkawayan, Guinyangan, Quezon and Labo, Cam. Norte in locating victims for depositions (Venus de Mesa)	P 3,502.90
Oct. 24, 1994	- transpo and food expenses of some claimants during the depositions (Lina Fajardo)	P 2,000.00
Oct. 24, 1994	- transpo and food to Sorsogon and Cam. Sur in locating victims for depositions	P 1,000.00
Oct. 24, 1994	- transpo and food to Laguna and Batangas in locating victims for depositions (Letty Segui)	P 772.75
Oct. 25, 1994	- transpo and food of claimants during the depositions (Lina Fajardo)	P 6,577.27
Oct. 26, 1994	- transpo and food for claimants during the depositions	P 2,602.00
Oct. 27, 1994	- transpo and food for claimants during the depositions	P 3,596.00
Oct. 28, 1994	- transpo and food for claimants in going home to Cam. Norte and Lopez, Quezon	P 1,266.08
Oct. 28, 1994	- transpo and food of claimants in going home to Ilocos Norte	P 3,828.00
Oct. 28, 1994	- transpo for Juanito Ramirez in going back to Guinyangan, Quezon	P 150.00
Oct. 28, 1994	- transpo and reimbursements of expenses of SELDA-Bicol in fetching claimants and going back to Albay and Sorsogon	P 4,187.00
Oct. 28, 1994	- transpo for Marcelino Baez in going back to Quipot, Batangas	P 250.00

Oct. 28, 1994 - transpo of claimants from Cagayan Valley in going back to their province	P 3,906.00
Oct. 29, 1994 - transpo and food of claimants from Albay and Cam. Sur (c/o Gerry Mercader)	P 6,010.00
Oct. 31, 1995 - expenses of SELDA-Eastern Visayas in locating victims for depositions	P12,158.00
Oct. 31, 1994 - expenses of SELDA-Cebu during the depositions	P 5,000.00
Nov. 17, 1994 - reimbursements of TFD-Southern Tagalog in bringing victims for depositions from Mulanay, Quezon to Manila	P 1,570.00
Nov. 22, 1994 - expenses of SELDA-Iloilo during the depositions	P23,436.00
Total Expenditures	P82,612.00

FROM : R. C. DOMINGO, JR.

PHONE NO. : 632 8192620

Mar. 17 1999 04:19AM PG

**Claimants 1081, Inc.***49 Durian St, Project 2, Quezon City  
Tels. No: 436-0516/912-4005*

March 14, 1999

Atty. Robert Swift  
Class Lead Counsel  
Marcos Human Rights Litigation

Thru: Atty. Rod Domingo  
15-B LPL Center  
130 Alfaro St., Salcedo Village  
Makati City, Philippines

Dear Atty. Swift,

Warm greetings from the Board of Directors and in behalf of all our claimant-members!

We would like to convey our appreciation for your continuing and successful handling of the class suit. We appreciate the efforts, especially because we know how difficult it is, to get the Marcoses to settle the case. Sans the objectionable and irrelevant midnight insertions made by the Marcoses, the settlement agreement has our full support.

The hearing on April 29, 1999 on the final approval of the settlement agreement will include the determination of the expenses incurred in the class suit. In consultation with Atty. Rod Domingo, we are therefore submitting to you our list of expenses in support of the class counsel during the five years that Claimants 1081 has been in existence, including its organizational phase from April 1994.

Attached herewith is the list of our expenses, amounting to **\$20,022.20**, as culled from our financial records.

We hope that you can include these in your motion to the court for the determination of expenses in the class suit.

Regards,

Sincerely yours,  
  
Ramon Casiple  
Acting Secretary-General

NOTE:

Details available upon request.

FROM : R. C. KING, JR.

PHONE NO. : 632 812

Mar. 17 1999 04:19pm P2

FROM : R. G. KING, JR. PHONE NO. : 632 8123 Mar. 17 1999 04:19AM PZ

LIST OF EXPENSES OF CLAIMANTS 1081, INC.  
IN SUPPORT OF THE CLASS COUNSEL  
APRIL 1994-APRIL 1999

					1994 Expenses	1995 Expenses	1996 Expenses	1997 Expenses	1998 Expenses	1999 Expenses	Subtotal for 6 Years	Total Cost
<b>A</b> Consultation meetings between claimants and the class counsels (15 meetings)												
1. Communications expenses			P2,120.00	P2,840.00	P2,568.00	P2,200.00	P3,245.00	P1,450.00	P12,303.00	P7,386.00	P 27,856.85	
2. Transportation expenses			P600.00	P1,600.00	P1,565.00	P1,875.50	P1,320.00	P975.00	P834.35	P 8,187.85		
3. Reproduction of case materials			P1,600.00	P1,198.50	P1,440.00	P1,507.65	P1,367.50					
<b>B.</b> Assistance extended to class counsel in sending class notices												
1. Communications expenses (classifications of class notices)		P6,500.00	P1,112.65	P450.00	P2,525.00	P7,850.30	P8,950.75	P27,388.70			P 34,986.40	
2. Meetings with claimants		P1,955.50	P257.00	P159.00	864.50	P1,656.70	P1,803.00	P6,697.70				
<b>C.</b> Assistance in updating and briefing of claimants											P 449,731.00	
1. Transportation expenses to various regions (56 trips by a Claimants 108 officer to various regions for meetings with member-claimants)		P18,950.00	P36,845.50	P67,980.70	P72,502.25	P69,990.00	P24,763.45	P291,031.90				
2. Board and lodging expenses (for regional trips)		P4,580.00	P8,539.50	P17,690.00	P19,200.00	P18,890.50	P5,780.40	P74,680.40				
3. Reproduction of case materials		P12,670.00	P10,570.00	P7,500.00	P8,550.00	P10,240.00	P4,250.00	P30,240.70				
4. Communications expenses		P4,807.40	P7,360.00	P4,555.50	P5,169.30	P6,368.50	P1,980.00	P33,780.00				
<b>D.</b> Assistance in maintaining and updating addresses and other information on class members												
1. Reproduction expenses		P2,430.00	P1,560.00	P945.00	P1,666.50	P730.00	P1,269.50	P31,780.00				
<b>E.</b> Assistance in public information on the class suit												
1. Press conferences, statements & releases		P6,700.00	P5,890.00	P3,256.50	P4,173.00	P4,550.00	P1,450.00	P26,019.50			P 184,345.55	

FROM : R. COMMINGO, JR.

PHONE NO. : 632 812-440

Mar. 17 1999 04:20AM PB

<b>F.</b>			
1.	Assistance in consultation with various officials of the Philippine & Swiss government	P1,750.00 P1,500.00 P35,500.00	P3,057.00 P3,500.00 P18,500.00
2.	Press kit and hand-outs Media representation	P2,180.40 P2,620.00	P2,789.50 P2,900.00
3.	Production of printers, situationers and other similar materials on the class suit	P23,280.00	P22,262.5 P27,500.00
4.		P13,500.00	P1,060.00 P750.00
			P11,500.00
			P111,780.00
<b>Total Cost</b>		P1,063.00	
<b>Total Cost in US Dollar (@ \$1=P35)</b>			P31,063.00

## HÜSSY VON GRAFFENRIED &amp; PARTNER

RECHTSANWÄLTE / ATTORNEYS AT LAW

DR. HANS HÜSSY  
 DR. CHRISTOPH VON GRAFFENRIED  
 DR. URS SAXER LL.M.

CH-8034 ZÜRICH, POSTFACH  
 BELLERIVESTRASSE 10  
 TELEFON: 01-383 87 34  
 TELEFAX: 01-383 15 14

MWST-Nr. 295302

Kohn Swift & Graf, P.C.  
 1101 Market Street  
 Suite 2400  
 Philadelphia, PA 19107  
 USA

March 5, 1999 G/dk

## RECHNUNG / STATEMENT / NOTE

Fee for services rendered for Marcos Human Rights Litigation, as per the attached detailed list (i.a. advising on Swiss law, assisting with regard to letters rogatory proceedings in Zurich, Freiburg and Geneva and related appellate proceedings etc.) as from April 19, 1993:

Fee	CHF	37'093.--
Disbursements (as per separate list)	CHF	<u>696.80</u>
 Total	CHF	37'789.80
=====		

Please pay the above amount to my account no. R3-569,7691.0, Dr. Christoph von Graffenried, with Swiss Bank Corporation, 8030 Zürich-Hottingen, Switzerland, or by cheque. Thank you.

Honorar für Kohn S. & Graf P.C.			ab dem	as from:	31.03.93
			Name des Berichts: "Honorar für bestimmten Klienten"		
Mandatsbezeichnung	Datum	Leistung	Zeit in Minuten		
KSG/marcos	05.04.93	Tel. Swift	24		
	05.04.93	Tel. Fed.off.of police	18		
	06.04.93	Tel. FOP/judge/Distr.atty.	60		
	06.04.93	legal research re letters. rog.	60		
	07.04.93	Tel. cdt.	30		
	15.04.93	conf. in Philadelphia	120		
	19.04.93	legal research re letters rog.	90		
	19.04.93	Tel. cdt.	18		
	28.04.93	Tel. cdt.	18		
	07.05.93	Tel. Cosandey, distr. Atty, study doc.	18		
	10.05.93	Tel. Swift	18		
	10.05.93	Tel. Cosandey, distr. Atty.	30		
	12.05.93	legal research re Art.271 CrimCode, Fax	84		
	23.06.93	Tel. District court/Fax cdt.	24		
	24.06.93	Fax send	6		
	16.07.93	Fax cdt./study court orders	54		
	20.07.93	Tel. Honegger	18		
	20.07.93	legal research re doc.production	24		
	22.07.93	legal research in supr.Court library	90		
	22.07.93	Tel Distr.Court	72		
	30.07.93	Fax Swift + Atty in Geneva	48		
	30.07.93	Tel. an Swift	18		
	30.07.93	Tel. judge Geneva	18		
	17.08.93	Tel. Swift	18		
	19.08.93	legal res. re attachment	60		
	19.08.93	Tel. Trib.de Fribourg	18		
	19.08.93	Tel. Swift	6		
	19.08.93	Tel. Tribunal de Geneva	24		
	23.08.93	2x Tel. und Fax atty.in Geneva	54		
	03.09.93	study letter Distr. Court	12		
	03.09.93	Fax cdt.	54		
	06.09.93	Fax cdt./study orders sup.Court	18		
	07.09.93	study file supr. Court	60		
	07.09.93	get docs. from supreme court	48		
	08.09.93	2x letter Supr. Court	12		
	08.09.93	copy and contr. file of supr. Court	30		
	09.09.93	Fax an Swift	48		
	27.09.93	Fax cdt. Re contract 22.9.93	18		
	28.09.93	contr. Translation orders	72		
	29.09.93	review Fax Swift + reply	30		
	29.09.93	study writ of appeal	60		
	11.10.93	study order Supr. Court and court file	204		
	11.10.93	Tel.court re costs and research	42		
	11.10.93	Tel. Swift (2x)	24		
	12.10.93	legal research in law inst., Fax	60		
	13.10.93	legal research re appeal	270		
	15.10.93	draft reply to appeal	420		
	18.10.93	draft reply o appeal	498		
	19.10.93	write reply to appeal	450		
	19.10.93	Tel. cdt.	18		
	20.10.93	Fax cdt.	18		
	24.11.93	review order, letter. cdt.	60		
	25.11.93	research re appeal	360		
	25.11.93	Tel. translator + Fax	18		
	26.11.93	Tel.Fed.Office of Justice , research	114		
	29.11.93	Tel. Fed. Office of Justice, Tel. Swift, RS	84		
	28.01.94	study order cass.Court	48		
	08.02.94	Tel. Supr.Court	12		

Mandasbezeichnung	Datum	Leistung	Zeit in Minuten
KSG/marcos	08.02.94	Swift	12
	10.02.94	study order supreme Court	24
	15.03.94	Tel. cdt.	24
	17.03.94	study doc. re Freiburg	42
	17.03.94	Fax cdt.	18
	30.03.94	Fax to Swift, study of file and law	318
	02.05.94	Tel. cdt.	12
	18.02.95	study of judgement	24
	18.02.95	Tel. from cdt.	42
	31.03.95	Tel. cdt.	30
	02.06.95	study Fax v. 29.5.95, Tel. Swift	48
	28.08.95	Tel. Swift	18
	28.08.95	Tel. Cosandey Distr. Atty.	30
	29.08.95	Tel. Swift	20
	29.08.95	Fax to Swift	35
	29.08.95	Tel. M.Kurer	30
	05.09.95	Tel. from Swift from Manila	40
	14.09.95	Tel. Swift	10
	24.11.95	Tel. Swift	15
	25.01.96	Tel. Swift	40
	26.03.96	Conf. with Swift	150
	05.09.96	Tel. Distr. Atty.	15

Total Zeit in Minuten: 5299 Minuten

Total Zeit in Stunde.: Total hours: 88.32 Stunden / hours

## Honorarberechnung für Mandat : Marcos

Stundensatz:/hourly rate: SFr. 420.00

Honorar netto: Fr. 37'093.00

## Spesenabrechnung für Klient: KSG

04. Mrz. 99

Name des Berichtes:  
 "Spesen für einen bestimmten Klienten"  
 Name der Abfrage:  
 Spesen für einen bestimmten Klienten

Mandats-Kurzbezeichnung	Datum	SpesenTyp	Spesen-Nr	BetragBrutt	MwSt-Satz	MwSt-Betrag	BetragNetto	Vorsteuer	Konto
KSG/marcos	05.04.93	Tel. Swift	4150	SFr. 37.00	0.00%	Fr. 0.00	Fr. 37.00	Fr. 0.00	
	06.04.93	Tel. FOP/Sup.C./Distr.C.	4151	SFr. 10.00	0.00%	Fr. 0.00	Fr. 10.00	Fr. 0.00	
	07.04.93	Tel. Klt. + Fax	4152	SFr. 34.80	0.00%	Fr. 0.00	Fr. 34.80	Fr. 0.00	
	19.04.93	Tel. Klt.	4153	SFr. 11.50	0.00%	Fr. 0.00	Fr. 11.50	Fr. 0.00	
	28.04.93	Tel. Klt.	4154	SFr. 15.30	0.00%	Fr. 0.00	Fr. 15.30	Fr. 0.00	
	10.05.93	Tel. Swift	4156	SFr. 21.40	0.00%	Fr. 0.00	Fr. 21.40	Fr. 0.00	
	10.05.93	Tel. Cosandey	4155	SFr. 1.40	0.00%	Fr. 0.00	Fr. 1.40	Fr. 0.00	
	23.06.93	Tel.Distr.C./Fax Klt.	4157	SFr. 3.70	0.00%	Fr. 0.00	Fr. 3.70	Fr. 0.00	
	16.07.93	Fax Klt.	4158	SFr. 3.50	0.00%	Fr. 0.00	Fr. 3.50	Fr. 0.00	
	22.07.93	Tel. Distr.C., Frau Roth	4159	SFr. 5.00	0.00%	Fr. 0.00	Fr. 5.00	Fr. 0.00	
	30.07.93	Fax Swift + T.	4160	SFr. 5.70	0.00%	Fr. 0.00	Fr. 5.70	Fr. 0.00	
	30.07.93	Tel. an Swift	4161	SFr. 20.00	0.00%	Fr. 0.00	Fr. 20.00	Fr. 0.00	
	30.07.93	Tel. Geneva	4162	SFr. 2.00	0.00%	Fr. 0.00	Fr. 2.00	Fr. 0.00	
	19.08.93	Tel. Swift	4163	SFr. 4.00	0.00%	Fr. 0.00	Fr. 4.00	Fr. 0.00	
	03.09.93	Fax Klt.	4164	SFr. 10.90	0.00%	Fr. 0.00	Fr. 10.90	Fr. 0.00	
	06.09.93	Fax Klt./ord	4165	SFr. 8.70	0.00%	Fr. 0.00	Fr. 8.70	Fr. 0.00	
	08.09.93	copies file sup.C.	4166	SFr. 60.00	0.00%	Fr. 0.00	Fr. 60.00	Fr. 0.00	
	13.09.93	Fax an Swift	4168	SFr. 7.10	0.00%	Fr. 0.00	Fr. 7.10	Fr. 0.00	
	27.09.93	Federal-Express	4169	SFr. 40.00	0.00%	Fr. 0.00	Fr. 40.00	Fr. 0.00	
	27.09.93	Fax Klt. betr. Vertrag	4170	SFr. 8.10	0.00%	Fr. 0.00	Fr. 8.10	Fr. 0.00	
	29.09.93	Fax an Swift	4171	SFr. 7.50	0.00%	Fr. 0.00	Fr. 7.50	Fr. 0.00	
	29.09.93	Fax an Swift + copies	4172	SFr. 42.80	0.00%	Fr. 0.00	Fr. 42.80	Fr. 0.00	
	30.09.93	Fax senden	4173	SFr. 30.90	0.00%	Fr. 0.00	Fr. 30.90	Fr. 0.00	
	11.10.93	Kopien, Porto	4174	SFr. 59.00	0.00%	Fr. 0.00	Fr. 59.00	Fr. 0.00	
	11.10.93	Fax Klt.	4175	SFr. 29.00	0.00%	Fr. 0.00	Fr. 29.00	Fr. 0.00	
	12.10.93	Fax	4176	SFr. 8.50	0.00%	Fr. 0.00	Fr. 8.50	Fr. 0.00	
	19.10.93	copies appeal reply	4177	SFr. 18.00	0.00%	Fr. 0.00	Fr. 18.00	Fr. 0.00	
	19.10.93	Tel. Klt., Porto	4178	SFr. 12.00	0.00%	Fr. 0.00	Fr. 12.00	Fr. 0.00	
	20.10.93	Porto, Fax Klt.	4180	SFr. 32.20	0.00%	Fr. 0.00	Fr. 32.20	Fr. 0.00	
	20.10.93	Fax Klt.	4179	SFr. 9.70	0.00%	Fr. 0.00	Fr. 9.70	Fr. 0.00	
	30.11.93	Fax	4181	SFr. 21.20	0.00%	Fr. 0.00	Fr. 21.20	Fr. 0.00	
	28.01.94	Fax Swift	4182	SFr. 25.50	0.00%	Fr. 0.00	Fr. 25.50	Fr. 0.00	
	08.02.94	Tel. Obergericht	4183	SFr. 1.00	0.00%	Fr. 0.00	Fr. 1.00	Fr. 0.00	
	08.02.94	Tel. Swift	4184	SFr. 7.00	0.00%	Fr. 0.00	Fr. 7.00	Fr. 0.00	
	15.03.94	Tel. Klt.	4185	SFr. 16.00	0.00%	Fr. 0.00	Fr. 16.00	Fr. 0.00	
	02.05.94	Fax	4186	SFr. 6.40	0.00%	Fr. 0.00	Fr. 6.40	Fr. 0.00	
	29.08.95	Fax	644	SFr. 11.20	6.50%	Fr. 0.68	Fr. 10.52	Fr. 0.00	
	18.09.95	Fax	695	SFr. 5.90	6.50%	Fr. 0.36	Fr. 5.54	Fr. 0.00	
	26.03.96	fotocopies	1354	SFr. 20.00	6.50%	Fr. 1.22	Fr. 18.78	Fr. 0.00	
	06.05.96	Fax	1621	SFr. 7.70	6.50%	Fr. 0.47	Fr. 7.23	Fr. 0.00	
	05.09.96	Tel. BS	1885	SFr. 15.20	6.50%	Fr. 0.93	Fr. 14.27	Fr. 0.00	

Mandats- Kurzbezeichnung	Datum	Spesentyp	Spesen-Nr	BetragBrutto	MwSt-Satz	MwSt-Betrag	BetragNetto	Vorsteuer	Konto
Total Mandat: KSG/mar				Fr. 696.80		Fr. 3.66	Fr. 693.14	Fr. 0.00	
<b>Total Klient: KSG</b>				<b>Fr. 696.80</b>		<b>Fr. 3.66</b>	<b>Fr. 693.14</b>	<b>Fr. 0.00</b>	
Endsumme:				Fr. 696.80		Fr. 3.66	Fr. 693.14	Fr. 0.00	